

REDACTED

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

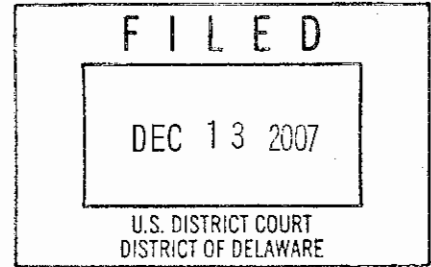
v.

MARK RYAN HOFFMAN,

Defendant.

REDACTED

Criminal Action No. 07-167



INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNTS ONE TO SIX

From on or about May 27, 2003, through on or about May 13, 2007, in the District of Delaware, Mark Ryan Hoffman, the defendant, knowingly received and attempted to receive child pornography, that is, computer generated visual depictions in the form of computer files which are of minors engaged in sexually explicit conduct, specifically, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area, which child pornography had been transported in interstate and foreign commerce by computer, the dates being described more particularly, as follows:

<u>Count</u>	<u>Date Received</u>
1	May 27, 2003
2	June 12, 2003
3	July 11, 2003
4	April 21, 2006
5	June 17, 2006
6	May 13, 2007

in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

COUNT SEVEN

On or about October 26, 2007, in the District of Delaware, Mark Ryan Hoffman, the defendant, knowingly possessed a computer hard drive and other digital storage media that contained images of child pornography, that is, visual depictions which are of minors engaged in sexually explicit conduct, specifically, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area, which child pornography had been transported in interstate and foreign commerce and which had been produced using materials which had been transported in interstate commerce, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

COUNTS EIGHT AND NINE

From on our about July 11, 2003 through on or about June 17, 2006, in the District of Delaware, Mark Ryan Hoffman, the defendant, knowingly received and attempted to receive visual depictions, that is, computer files that depict computer images that are or appear to be of a minor engaging in graphic sexual intercourse, and that lack serious literary, artistic, political, or scientific value, which images had been transported in interstate and foreign commerce by computer, and which images had been produced using materials that had been shipped and transported in interstate or foreign commerce, the dates being described more particularly as follows:

<u>Count</u>	<u>Date Received</u>
8	July 11, 2003
9	June 17, 2006

in violation of Title 18, United States Code, Sections 1466A(a)(2)(A) and (B), and 2252A(b)(1).

COUNT TEN

On or about October 26, 2007, in the District of Delaware, Mark Ryan Hoffman, the defendant, knowingly possessed visual depictions, that is, computer files, that depict computer images that are or appear to be of minors engaging in graphic sexual intercourse, and that lack serious literary, artistic, political, or scientific value, which images had been transported in interstate and foreign commerce by computer, and which images had been produced using materials that had been shipped and transported in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 1466A(b)(2)(A) and (B), and 2252A(b)(2).

A TRUE BILL:

Foreman _____

COLM F. CONNOLLY
United States Attorney

By: Christopher J. Burke
Christopher J. Burke
Assistant United States Attorney

Dated: December 13, 2007